

IDD 9518  
PF 17a  
1/28/02

FILE COPY

January 28, 2002  
B-09075-0138-1010  
REPA2-1010-015

Ms. Amberet Green  
Regional Project Officer  
U.S. Environmental Protection Agency  
1200 Sixth Avenue  
Seattle, Washington 98101

Subject: EPA Contract No. 68-W-99-009, Work Assignment R10910, Task 07, FMC Pocatello, Idaho - Completion of RFA, Corrective Action, Groundwater Monitoring, Compliance with Consent Decree, Work Assignment R10910, Technical Comments on Facility's Closure Plan Comment Reposnses

Dear Ms. Green:

In response to Work Assignment R1010, Task 07, under EPA Contract No. 68-W-99- 009, Booz Allen Hamilton has prepared technical comments on the responses FMC has submitted to EPA's Second Notice of Deficiency (dated November 8, 2001) for the Pond 17 and 18 Closure Plans. Please find the technical comments attached.

If you have any questions regarding this deliverable, please contact me at (206) 386- 4791.

Sincerely,

BOOZ ALLEN & HAMILTON INC.  
Patricia Shanley  
Work Assignment Manager

cc: Linda Meyer, EPA Project Manager  
Dean Walter, Contracting Officer (letter only)  
BA&H PMT QA/QC Coordinator

FILE COPY

**TECHNICAL REVIEW COMMENTS**  
**POND 17 and 18 CLOSURE PLANS**  
**December 2001 Responses to EPA November 8, 2001 Comments**

**GENERAL COMMENT**

Several responses from the facility note that the requested information is included in another document and that the facility will, therefore, not replicate this information in the Quality Assurance Project Plans (QAPPs). This approach is acceptable provided that the facility cites, within the appropriate sections of the QAPPs, where the requested information can be found.

**SPECIFIC COMMENTS**

Original EPA Comment:

- 5.6     *The QAPP must describe the protocols in place to verify the qualifications and capacity of support contractors (i.e., laboratory, sampling contractor, and data validation contractor), select support contractors, monitor each contractor's performance, and verify and ensure initial and continued compliance with the QAPP and associated FSP. These protocols must address specific procedures and responsibilities.*

Facility Response:

*"The QAPP will be revised to clarify the roles and responsibilities of support contractors and to specify surveillance activities and audits of laboratories and sampling contractors. However, the QAPP will not be revised to specify protocols to verify the qualifications and capacity of support contractors, as EPA's purview does not extend to these matters."*

EPA Response:

EPA has the authority to accept or reject the facility's plans for data collection in support of a closure. EPA is responsible for verifying that the facility's plans are technically valid and compliant with governing regulations and guidance, prior to giving approval for implementation. The facility's plans, therefore, must demonstrate and ensure that all implementing personnel, whether of the facility or a subcontractor, have the necessary qualifications and capacity to execute the stated procedures and methodologies.